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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER ON DEFENDANTS
UBER TECHNOLOGIES, INC., RASIER,
LLC, RASIER-CA, LLC'S MOTION TO
ENFORCE PROTECTIVE ORDER**

1 This cause coming before the Court on Defendants Uber Technologies, Inc., Rasier, LLC and
2 Raiser-CA, LLC's Motion to Enforce Protective Order, due notice given and the Court being fully
3 advised, THE COURT HEREBY FINDS:

4 (a) The information on the 587 rows of the spreadsheet sent by Bret Stanley to Defendants'
5 counsel on October 9, 2024, which identifies Defendants' internal policy related resources and the
6 repository where each resource is maintained and which are accompanied by MDL Bates numbers
7 (identifiable as the first 587 rows on the version of the spreadsheet attached as Exhibit 3 to the
8 Declaration of Veronica Gromada [ECF 3512-1]) ("Confidential Information"), is covered by the
9 Protective Order, which requires the Confidential Information be used "only for prosecuting,
10 defending, or attempting to settle this Action or the [related JCCP] consolidated action" [ECF 176, ¶
11 7.1];

12 (b) Based on the record presented, Mr. Stanley has violated the Protective Order [ECF
13 176], by using and disclosing the Confidential Information outside of the MDL Litigation.

14 Accordingly, IT IS HEREBY ORDERED:

15 (c) Within three days of the date of this Order, Mr. Stanley shall identify to Defendants'
16 counsel all persons outside of the MDL Litigation to whom Mr. Stanley has disclosed any information
17 covered by the Protective Order, including without limitation, the Confidential Information, and Mr.
18 Stanley shall identify to Defendants' counsel all court proceedings in which Mr. Stanley is aware that
19 the Confidential Information has been used or disclosed in discovery or otherwise;

20 (d) Within three days of the date of this Order, Mr. Stanley shall provide a copy of this
21 Order to all persons and courts identified pursuant to paragraph (c) of this Order with notice to
22 Defendants' Counsel of same; and

23 (e) Mr. Stanley shall take reasonable efforts to retrieve or ensure the destruction of all
24 unauthorized Confidential Information to all persons identified pursuant to paragraph (c) of this Order.

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26 **IT IS SO ORDERED:**

Dated: _____

HON. LISA J. CISNEROS
United States Magistrate Judge

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